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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION**

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11 KIMBERLY HUDSON-BRYANT,
individually and on behalf of all others
12 similarly situated,

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Plaintiffs,

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v.

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16 OCMBC, INC. dba LOANSTREAM,
PREMIER FINANCIAL MARKETING
17 LLC D/B/A RESMO LENDING, AND
SEAN ROBERTS

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Defendants.

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Case No. 8:24-cv-00067-FWS-JDE

**DECLARATION OF ANDREW R.
PERRONG IN SUPPORT OF JOINT
MOTION AND STIPULATION TO
CONTINUE CASE DEADLINES**

Judge: Hon. Fred W. Slaughter

Magistrate: Hon. John D. Early

Action Filed: January 11, 2024

Trial Date: May 12, 2026

1 I, Andrew R. Perrong, declare:

2 1. I am an attorney at law admitted Pro Hac Vice to United States District
3 Court, Central District of California and am a principal with Perrong Law, LLC co-
4 counsel for Plaintiff Kimberly Hudson-Bryant in this action. I have personal
5 knowledge of the facts set forth in this declaration and I submit this declaration in
6 support of the Parties' Joint Motion and Stipulation to Continue Case Deadlines.

7 2. Plaintiff's husband had surgery in July 2025, and is still recuperating.
8 Plaintiff is his primary caregiver during his recuperation. Accordingly, Plaintiff has
9 been unavailable to participate in this lawsuit, including by providing her deposition,
10 and responding to written discovery requests during the pendency of her husband's
11 surgery and recuperation. This, combined with the unavailability of defendant
12 LoansStream's 30(b)(6) witness, will prevent the parties from completing discovery
13 within the current deadlines, which will also impact other existing deadlines such as
14 class certification and expert discovery.

15 3. For the reasons set forth herein, and to conserve time and judicial
16 resources, the Parties believe that a 120-day extension of all deadlines will allow
17 the Parties to properly complete discovery and prepare for trial.

18 I declare under penalty of perjury under the laws of the State of California that
19 the foregoing is true and correct, and that this declaration was executed on September
20 23, 2025, at Glenside, PA.

21 /s/ Andrew R. Perrong
22 Andrew R. Perrong, Esq.
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